

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION**

In re: Michele Sekelsky, <i>and</i> Michele Marie Sekelsky, Debtors U.S. Bank National Association, Not In Its Individual Capacity But Solely As Trustee For The Cim Trust 2018-NR1 Mortgage-Backed Notes, Series 2018-NR1 Movant v. Michele Sekelsky, <i>and</i> Michele Marie Sekelsky Debtors/Respondent Charles J DeHart, III, Esquire Trustee/Respondent	Bankruptcy No. 5:19-bk-04796-RNO Chapter 13 Related to Doc. No. 15
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**WILMINGTON SAVINGS FUND SOCIETY'S OBJECTION TO CONFIRMATION OF
DEBTORS' CHAPTER 13 PLAN**

Secured creditor, U.S. Bank National Association, Not In Its Individual Capacity But Solely As Trustee For The Cim Trust 2018-NR1 Mortgage-Backed Notes, Series 2018-NR1, ("U.S. Bank"), by and through its undersigned counsel, hereby objects to the proposed Chapter 13 Plan of Debtors, Michele Sekelsky, and in support thereof alleges as follows:

1. Debtors, Michele Sekelsky ("Debtors"), filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on November 8, 2019.

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2. U.S. Bank holds a security interest in the Debtor's real property located 508 River Street, Dickson City, PA 18519 (the "Property"), by virtue of a Mortgage recorded with the Bucks County Recorder of Deeds on March 4, 2004 in Book 1175, at Page 139, which has ultimately been assigned to U.S. Bank.
3. Said Mortgage secures a Note in the amount of \$37,500.00.
4. On November 21, 2019, Debtor filed a Chapter 13 Plan (the "Plan"). A true and correct copy of the Plan is attached hereto as Exhibit "A."
5. The Plan fails to include treatment of U.S. Bank's claim. The subject property and claim are, however, listed in Debtor's schedules. U.S. Bank objects to the Plan and seeks clarification as to Debtors' intentions in regard to the subject property and claim.
6. Thus, the Plan is unclear, as therefore, infeasible.
7. Accordingly, pursuant to 11 U.S.C.A. § 1325(a)(5) U.S. Bank National Association, Not In Its Individual Capacity But Solely As Trustee For The Cim Trust 2018-NR1 Mortgage-Backed Notes, Series 2018-NR1 hereby objects to Debtors' proposed Plan due to the fact that the treatment of Secured Creditor's Claim is not accounted for in the Plan filed by the Debtor. See 11 U.S.C.A. § 1322(b)(3) and (b)(5).

WHEREFORE, Secured creditor, U.S. Bank National Association, Not In Its Individual Capacity But Solely As Trustee For The Cim Trust 2018-NR1 Mortgage-Backed Notes, Series 2018-NR1, respectfully requests that this Court not confirm Debtors' Chapter 13 Plan.

Respectfully Submitted,
RAS Crane, LLC
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By: /s/Kevin Buttery
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Date: November 27, 2019

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MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION**

In re: Michele Sekelsky, <i>and</i> Michele Marie Sekelsky, Debtors U.S. Bank National Association, Not In Its Individual Capacity But Solely As Trustee For The Cim Trust 2018-NR1 Mortgage-Backed Notes, Series 2018-NR1 Movant v. Michele Sekelsky, <i>and</i> Michele Marie Sekelsky Debtors/Respondent Charles J DeHart, III, Esquire Trustee/Respondent	Bankruptcy No. 5:19-bk-04796-RNO Chapter 13 Related to Doc. No. 15
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 27, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or United States Mail to the following parties:

PATRICK JAMES BEST
ARM LAWYERS
18 NORTH 8TH STREET
STROUDSBURG, PA 18360

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MICHELE SEKELSKY
aka MICHELE MARIE SEKELSKY
508 RIVER STREET
DICKSON CITY, PA 18519

CHARLES J DEHART, III (TRUSTEE)
8125 ADAMS DRIVE, SUITE A
HUMMELSTOWN, PA 17036

ASST. U.S. TRUSTEE
UNITED STATES TRUSTEE
228 WALNUT STREET, SUITE 1190
HARRISBURG, PA 17101

Respectfully Submitted,

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